

**REMARKS**

This communication is in response to the Office Action of March 20, 2008.

Claims 61-70 are pending in this application. Claim 65 has been withdrawn from consideration. Claim 61 has been amended to more specifically point out and distinctly claim the subject matter of the invention. Specifically, Claim 61 has been amended to include executable instructions to “remove elements from the first and second normalized documents to facilitate rendering of a comparison document”. Dependent Claim 68 has been amended accordingly. Support for the amendments is found throughout the specification, and in particular, at page 9, lines 10-19, and page 10, line 10, to page 12, line 3. No new matter has been added.

Claims 61-64 and 66-70 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Baisley, U.S. Patent No. 6,502,112 (“Baisley”) in view of Aoyama et al., U.S. Patent No. 6,098,071 (“Aoyama”) and further in view of Ball et al., U.S. Patent No. 6,366,933 (“Ball”). Applicant traverses the rejections. Reconsideration of these claims is respectfully requested.

Applicant respectfully submits that the combination of Baisley, Aoyama, and Ball does not disclose the computer readable storage medium of the type called for in Claim 61. In particular, the proposed combination does not disclose removing “elements from the first and second normalized documents to facilitate rendering of a comparison document.”

The Examiner has suggested that “[B]aisley does not specifically teach a ‘*line-by-line comparison*.’ However, Ball teaches a method of tracking and viewing changes of documents of the Web (Ball at least Abstract, column 1 lines 50-57). Ball teaches an embodiment utilizing an algorithm for differential file comparison, whereby a token is a textual line, and each line has weight equal to 1 (Ball column 17 line 65 to column 18 line 16). It would have been obvious to one of ordinary skill in the art at the time of the invention to apply Ball to Baisley, providing Baisley with a more accurate algorithm for comparison analysis.” (Office Action, Page 4.)

Applicant respectfully submits that the passage in Ball relied on by the Examiner refers to the "UNIX diff" algorithm. As disclosed in Ball, "[T]his is the well-known comparison algorithm used by the Unix difficulty in 'J. W. Hunt and M. D. McIlroy. An algorithm for differential file comparison. Technical Report Computing Science TR#41, Bell Laboratories, Murray Hill, N.J., 1975'" (Ball, col. 18, lines 6-8). This algorithm is described in the Background section of the Specification as one of the traditional methods for comparing documents. As disclosed in the Specification, "[T]he traditional method of locating document changes within pure text files is accomplished via a technique known as file differencing, or diffing. UNIX has a utility called 'diff' that is used for file differencing. It works by comparing each line in a first file (the Right File) with each line in a second file (the Left File). A carriage return character typically separates each line from each other line." (Specification, page 1, lines 6-9).

This UNIX diff algorithm, however, is "ineffective" (Specification, page 4, lines 14-17) for performing straight line-by-line comparisons of HTML documents. As explained in the Specification, "[T]he problem is that the typical differencing operations as described above do not work well for HTML documents. In particular, unlike pure text documents, or documents created using a word processor, carriage returns in HTML documents are not significant. In more detail, the width of lines displayed by a viewer will be determined by the width of the viewer window, not where carriage returns are entered in the HTML file. Therefore, a typical differencing operation that uses lines for a unit of comparison does not work successfully when comparing HTML files since the operation may unnecessarily identify differences which are insignificant. In addition, the HTML language treats contiguous sequences of white space characters as being equivalent to a single space character. Therefore, a contiguous sequence of white space characters is equivalent to a single white space character in the HTML language, but a typical differencing operation will not take this into account." (Specification, page 3, lines 4-13).

The Specification further explains that HTML documents must be normalized to apply a traditional line-by-line comparison algorithm such as UNIX diff to compare the documents. "In general, the normalization may involve the conversion of the HTML document into one or more blocks of information wherein each block of information may be treated as a single line for

purposes of the comparison. Thus, the normalization permits a typical line based comparison module to be used to accurately compare two HTML documents.” (Specification, page 9, lines 4-7). At the end of the normalization, “...the two normalized HTML documents may be compared by a typical line comparison operation while still maintaining the formatting of the HTML document. In summary, the invention establishes a method for generating a normalized form for an HTML document so that equivalent representations, once normalized, will appear identical when analyzed via typical line differencing.” (Specification, page 11, lines 7-11).

The normalization is performed by applying multiple rules, which include removing “elements from the first and second normalized documents to facilitate rendering of a comparison document”. (Claim 61) As described in the Specification, “[T]he rules may include removing the carriage returns from the HTML document, converting multiple white spaces in the document into single white spaces, separating any block level HTML elements from each other onto separate lines by inserting a carriage return before the start tag so that each block in the HTML document is treated as a separate line for comparison purposes, and keeping any text level HTML elements on the same line”. (Specification, page 10, lines 11-15) Additional rules remove “elements from the first and second normalized documents to facilitate rendering of a comparison document”. (Claim 61) These rules are provided “to avoid errors in the rendering stage when the changed blocks of HTML, inserted into the body of a new HTML document, are rendered in the browser”. (Specification, page 11, line 21, to page 12, line 1)

That is, removing “elements from the first and second normalized documents to facilitate rendering of a comparison document” (Claim 61) allows the comparison document to be rendered appropriately so that the “visual formatting of one of the first and second documents” (Claim 61) is preserved. Such removal is therefore required to apply a traditional line-by-line comparison algorithm such as UNIX diff to compare documents and preserve the “visual formatting of one of the first and second documents”. (Claim 61) No such removal of “elements from the first and second normalized documents to facilitate rendering of a comparison document” (Claim 61) is disclosed, taught, or suggested in the cited prior art, either alone, or in combination.

In contrast, the line-by-line comparison disclosed in Ball makes use of the UNIX diff algorithm without any normalization of the HTML documents to “remove elements from the first

and second normalized documents to facilitate rendering of a comparison document” (Claim 61). As described in Ball, “[A] simple lexical analysis of an HTML document creates the token sequence and converts the case of the markup name and associated (variable,value) pairs to upper-case; *parsing is not required*” (Ball, col. 18, lines 19-22, emphasis added.) Since no parsing is required, Ball therefore teaches away from performing the normalization of the present invention and removing “elements from the first and second normalized documents to facilitate rendering of a comparison document”. (Claim 61)

Such removal of “elements from the first and second normalized documents to facilitate rendering of a comparison document” (Claim 61) is also not disclosed, taught, or suggested in Baisley or Aoyama, either alone or in combination with Ball. The cited prior art combination therefore does not disclose, teach, or suggest the claimed element of removing “elements from the first and second normalized documents to facilitate rendering of a comparison document” (Claim 61). The lack of disclosure, teaching, or suggestion for removing “elements from the first and second normalized documents to facilitate rendering of a comparison document” (Claim 61) is a strong indication that doing so was not obvious at the time the invention was made.

Accordingly, in view of the foregoing amendments and remarks, it is respectfully submitted that the application is now in condition for allowance. The Examiner is invited to contact the undersigned if there are any residual issues that can be resolved through a telephone call.

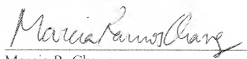
The Commissioner is hereby authorized to charge any appropriate fees to Deposit Account No. 05-1283.

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